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May 27, 2022

Hon. Edward S. Kiel, U.S.M.J.  
United States District Court, District of New Jersey  
2 Federal Square, Courtroom 8  
Newark, NJ 07102

Via: ECF

Re: Al Ummah Community Center et al. v. Teaneck et al.,  
Civ. No.: 20-cv-14181 (KM)(ESK)

Dear Judge Kiel,

I hope this correspondence finds you well. Please accept this letter as a joint status letter in accordance with the Court's February 14, 2022 Order.

1. Written Discovery Propounded by the Plaintiffs upon the Defendants: Defendants have responded. Plaintiffs reserve the right to assert additional deficiencies as identified in due course.
2. Written Discovery Propounded by the Defendants upon the Plaintiffs: Plaintiffs will provide responses to Defendant ZBA and begin a rolling production by June 8, 2022.
3. Plaintiffs and counsel for Defendant Atif Rehman have scheduled the deposition of defendant Atif Rehman to occur at 3:00 p.m. on Friday, June 3, 2022. Defendants ZBA and the Township of Teaneck object to the deposition proceeding on that date. Defendant Rehman objects to the deposition proceeding on that date, unless Plaintiffs produce all documents and exhibits, which Plaintiffs intend to use at the deposition, at least seventy-two (72) hours prior to the scheduled time of the deposition. Plaintiffs object to this request.
4. The ZBA has served Deposition Notices under Rule 30(b)(6). Plaintiffs object to the form and timing of those deposition notices, and reserve the right to seek a protective order should a meet and confer fail on this issue.

5. The ZBA requests that a full deposition schedule be stipulated or so ordered. Plaintiffs object for a host of reasons that will be presented to court if the parties cannot come to an agreement.
6. The parties respectfully request that the discovery be extended.

Respectfully submitted,  
s/Aymen A. Aboushi  
Aymen A. Aboushi, Esq.

Cc: All counsel of record via ECF